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April 13, 2023

**VIA ECF**

Honorable LaShann DeArcy Hall, U.S.D.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201  
Courtroom 4H North

***Re: Jonny Osmar Reyes Obando v. AMD Food Corp., et al***  
***Case No.: 1:23-cv-01681 (LDH)(SJB)***  
***MLLG File No.: 56-2023***

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Dear Judge Hall:

This firm represents Defendants AMD Food Corp., Sunshine Food Corp., and Asmatullah Tokhie (collectively "Defendants") in the above-captioned action. Defendants respectfully request an extension of time to respond to the complaint until May 11, 2023 and withdrawal of Plaintiff's Request for Certificate of Default ([Document No. 11](#)). The original due date to respond to the complaint was March 31, 2023 for Defendant Asmatullah Tokhie and April 10, 2023 for Defendants AMD Food Corp. and Sunshine Food Corp. Furthermore, Defendants waive any defenses related to service of process. There have been no prior requests for adjournments or extensions of time in this action. Defendants seek this extension as counsel was recently retained to represent Defendants in this action and need time to investigate the facts of this case. Moreover, an extension will allow the parties an opportunity to explore settlement discussions prior to Defendants responding to the complaint. This request will not affect any other schedule dates. Plaintiff consents to Defendants' request.

Defendants thank this Court for its time and attention to this matter.

Respectfully,

/s/  
Kyle F. Monaghan, Esq.

Cc: Counsel of Record